

December 27, 2016

To:
Office of the Secretary
Federal Communications Commission
Washington, DC 20554

Comments Filed Jointly by:

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And

The Berkshire-Litchfield Environmental Council²
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Re: FCC Docket # 16-399
Before the Federal Communications Commission:
In the Matter of: SECTION 214 APPLICATION(S) TO DISCONTINUE
DOMESTIC NON-DOMINANT CARRIER TELECOMMUNICATIONS
SERVICES

¹ Former *New York Times* contributor, author of *Electromagnetic Fields, a Consumer's Guide to the Issues and How to Protect Ourselves* (Harcourt Brace, First Edition 1995; iUniverse Back-In-Print Edition, 2007) which won a chapter Award of Excellence from the American Medical Writers Association; and Editor of *Cell Towers, Wireless Convenience? or Environmental Hazard? Proceedings of the "Cell Towers Forum," State of the Science, State of the Law* (Safe Goods/New Century Publishing, First Edition 2001; iUniverse Back-In-Print Edition, 2011).

² The Berkshire-Litchfield Environmental Council (BLEC) is a 501 (3)(c) non-profit organization that focuses on environmental issues affecting the Northwest corner of Connecticut and the Berkshires region of Massachusetts.

Dear FCC,

Please do not approve Docket #16-399, SECTION 214 APPLICATION(S) TO DISCONTINUE DOMESTIC NON-DOMINANT CARRIER TELECOMMUNICATIONS SERVICES.

The national copper landline network, which is truly one of the wonders of the industrialized world -- should be preserved at all costs. While many customers are “cutting the cord” in favor of wireless, especially in urban areas, the landline network is still the only viable system for low-cost voice and free Internet communication for most of America. We are years, if not decades, away from a fiber network being built nationwide. Nothing should be enacted by the FCC that jeopardizes the landline network unless, and until, something truly comparable and affordable is in place. To do otherwise penalizes seniors, low income, and rural communities. It may also introduce significant personal danger since the local emergency 911 first responder systems locate fixed residences and businesses via the landline network. As a nation we have spent a century perfecting our copper network and it should not be dismantled for a wireless profit model. The FCC has an obligation to preserve the legacy network that millions of people still rely upon, including our family which lives in a rural area and supports two home offices with three landlines plus a dedicated fax line. Proposal 16-399 will force people who do not have, or want, wireless connectivity for various reasons into a state of communication isolation with the potential to threaten livelihoods and safety.

Health Concerns:

As a medical/science journalist, former *New York Times* contributor, and author of two books on the subject of environmental nonionizing radiation effects, I am contacted regularly by people who have become sensitive to radiofrequency radiation (RFR) in particular. The FCC is well aware of the long-standing, unresolved, serious health concerns regarding RFR exposures. Recent literature has suggested effects far below current FCC standards and there are indications that the lower intensities may be more harmful than higher intensity exposures where the body has different compensatory mechanisms.

Below are a handful of recent examples that warrant caution in RF infrastructure siting that the diminishment/abandonment of the landline network would only exacerbate:

- The 2016 partial release of the \$28-million multi-year study by The National Toxicology Program (NTP) at the National Institutes of Health (NIH) found a causal relationship between RF in cell phone frequencies and malignant brain cancers (glioma), as well as benign nerve tumors (schwannomas) of the heart in male rats at non-thermal intensities (<http://ntp.niehs.nih.gov/results/areas/cellphones/index.html>). The release of the full report is expected in 2017 and preliminary information indicates it will contain similar results.
- The International Agency for Research on Cancer (IARC) at the World Health Organization (WHO) classified RF as a 2B (possible) human carcinogen in 2011. (http://www.iarc.fr/en/media-centre/pr/2011/pdfs/pr208_E.pdf) The NTP study not only reinforces that classification but indicates a reclassification of RF to a 2A (probable) carcinogen, or even to Group 1 (known) carcinogen for humans in the not too distant future.
- In 2015, 220 scientists who had published in peer-reviewed journals from 41 nations signed the International Scientists Appeal (<https://www.emfscientist.org>) to the United Nations and the WHO to coordinate their classifications of both low frequency electromagnetic fields (EMFs) and RF as 2B carcinogens in a manner that would strengthen WHO's own standards recommendations. It was a dramatic way to warn the august international public health entities that there is grave concern for the increasing ambient exposures from technology. Their warnings included everything from cell phones, infrastructure, Wi-Fi, 'smart' meter/grid technology, as well as devices like baby monitors and commercial broadcast uses. This warning would *de facto* extend to small cell/DAS and 5G systems that were given the green light by the FCC in 2016. Moreover, small cell/5G may warrant a WHO recommendation of its own.
- The BioInitiative report, edited by Cindy Sage and David O. Carpenter, MD, updated in 2012, is a treasure trove of experts and papers on the health and environmental effects by those who have done the work, including nearly 2000 papers from 29 international scientists – Ph.Ds and MDs -- from over

10 countries, including 10 from the U.S. (<http://www.bioinitiative.org>). Their conclusions note that the continued unfettered rollout of wireless technologies jeopardizes global health and recommends stricter biologically based standards, lower exposure limits, and certainly a more cautious, science-based approach.

- Joel M. Moskowitz, Ph.D., Director of the Center for Family and Community Health at the School of Public Health, University of California, Berkeley, maintains an excellent website with commentary on studies both pro and con related to many aspects of EMF/RF as pertains to public health issues. Called Electromagnetic Radiation Safety, the website is at: <http://www.saferemr.com>

There are multiple independent studies that have clearly identified human diseases and abnormalities that can occur due to chronic exposure to RF radiation far below the FCC standards which are based on short term, acute exposures, not the chronic long-term low level exposures from myriad sources most common today. There are also major professional organizations, including the American Academy of Environmental Medicine and the American Academy of Pediatrics, that have raised concerns regarding the current exposure limits.

In addition there are potential effects to wildlife from our ever increasing ambient RF exposures. (See attached 2016 briefing to the FCC by Albert M. Manville, II.³) Anything that increases these exposures is going in the wrong direction for all flora and fauna. The copper landline network is for now far safer regarding health and the environment.

If and when a national network based on fiber-to-the-house (completely bypassing the wireless component) is developed, shutting down the copper network can be revisited. But Docket # 16-399 puts the cart way before the horse.

³ “A BRIEFING MEMORANDUM: What We Know, Can Infer, and Don’t Yet Know about Impacts from Thermal and Non-thermal Non-ionizing Radiation to Birds and Other Wildlife,” by Albert M. Manville, II, Ph.D., C.W.B.1; Principal, *Wildlife and Habitat Conservation Solutions, LLC*²; Adjunct Professor, Johns Hopkins University’s Krieger School of Arts and Sciences, DC Campus³; and former U.S. Fish and Wildlife Service agency lead on avian-structural impacts — including from radiation. July 14, 2016

Coverage Concerns:

Problems beyond RF exposures include the fact that it is simply not possible in many areas to ever accomplish 100% wireless coverage for multi-factorial reasons that include: technical exposure limitations inherent to wireless, difficult topography, long driveways, and low population density that doesn't warrant an expensive full buildout, among others. Copper landlines are already present in most such areas and should be preserved, updated and fortified, if just as a legacy of a truly functioning communications history. Wireless, even when married to fiber, will never be able to accomplish the basic functions of simple voice communication and free DSL Internet (slow though it is) that the copper network already provides. For millions, it is the only thing they can afford and it is extremely reliable.

In addition:

- The copper network is far more impervious to cyberattacks, hacking, and fraud. It is proven far safer in disasters than cell networks which are the first to go down in such circumstances.
- The sound quality of the copper network is far superior. This is a significant issue for home businesses like ours and for people who interact with the media. As an author, I am often interviewed for radio programs. Landline connections are the clearest, most intelligible systems and in fact most stations request that non-in-station interviews be done via landlines.
- Many people, such as those with cardiac pacemakers and other implantables, are medically monitored via landlines. Being cut off from that could be life-threatening.
- For liability reasons, landlords who rent furnished dwellings, both long and short term, must have landlines, especially in areas with poor cell service.
- With so very many wireless devices coming into our midst, and with the advent of 5G and the Internet-of-Things, which will require millions of new antennas, the rising background of ambient RF will exponentially increase leading to more unpredictable systemic RF interference. Wired networks can at least guarantee that a request for 911 service will be met with a response.

These are all serious public safety, health, environment, fairness, and personal choice issues that the FCC has a fiduciary responsibility to protect. The stakes in passing Docket #16-399 are high. While this docket is a regional one, it is a harbinger of what the entire nation will soon face. Please do not enact it.

Sincerely,

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